

# GREEN KAMINER MIN & ROCKMORE LLP

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March 24, 2025

## VIA ECF

Honorable Ramon E. Reyes, Jr.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Reid v. Remekie*  
Case No. 1:25-cv-00904-RER-JRC

Dear Judge Reyes:

Our firm represents Petitioner Audley Reid in this Hague Convention proceeding. We write jointly with consent of Respondent's counsel to respectfully request that the Court issue an amended pretrial schedule for the above-referenced case.

On March 3, 2025, this Court issued a Discovery and Trial Management Order, scheduling the evidentiary hearing for this matter for April 30 and May 1, 2025. On March 14, 2025, newly retained counsel for the Petitioner filed their notices of appearance (ECF Nos. 19 and 20).

Mr. Min, lead counsel for the Petitioner, has a scheduling conflict on April 30, 2025. He is scheduled to be a speaker on a panel as part of the American Bar Association International Section Annual Conference being held in New York. Counsel for both parties met and conferred and agreed to submit this joint letter to respectfully request a brief continuance of the trial to May 1 and 2, 2025, or, alternatively, to any convenient time for the Court during the following week of May. In light of this request, the parties have conferred and agreed to an amended pretrial schedule. Annexed hereto as **Exhibit A** is the parties' proposed amended pretrial schedule.

Thank you very much for your consideration in this matter.

Very truly yours,

/s/Richard Min  
Richard Min  
*Attorney for Petitioner*

cc: All counsel (via ECF)